

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

KEAH TINGLER,	:	
	:	
Plaintiff	:	
	:	
v.	:	NO. 1:18-cv-1270-JEJ
	:	Hon. John E. Jones, III
COMMONWEALTH OF	:	
PENNSYLVANIA,	:	
PENNSYLVANIA STATE SENATE,	:	
AND JUSTIN FERRANTE	:	
	:	
Defendants	:	JURY TRIAL DEMANDED

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SUZANNE SALOV,	:	
	:	
Plaintiff	:	
	:	
v.	:	NO. 1:18-CV-01814-JEJ
	:	Hon. John E. Jones, III
COMMONWEALTH OF	:	
PENNSYLVANIA,	:	
PENNSYLVANIA STATE SENATE,	:	
AND JUSTIN FERRANTE,	:	
	:	
Defendants	:	JURY TRIAL DEMANDED

**JOINT STIPULATION FOR EXTENSION OF CASE
MANAGEMENT DEADLINES**

The parties, by and through their respective undersigned counsel,
have stipulated and agreed to a ninety (90) day extension of the fact

discovery deadline in the above-captioned matters in order to complete the exchange of discovery materials and depositions in this matter.

By an Order dated March 8, 2019 (Doc. 39), this Honorable Court ordered the consolidation of the above captioned cases for purpose of discovery and the coordination of discovery deadlines, and further ordered that the discovery deadlines set forth in the Court's December 28, 2018 Order (Doc. 25) in *Salov v. Commonwealth of Pennsylvania, et. al.*, 1:18-CV-1814 will be controlling for both cases.

The parties have exchanged and answered initial discovery requests. In addition, numerous electronic devices have been forensically analyzed, resulting in the discovery of tens of thousands of additional documents, are being reviewed and will be exchanged between the parties. Moreover, several depositions are expected to be necessary following the completion of the supplemental discovery exchanges.

In consideration of the foregoing, the parties agree that they will seek the Court's approval for the extension of the dates set forth in its May 21, 2019 Orders (1:18-cv-1270-JEJ, Doc. 63; 1:18-cv-01814-JEJ, Doc. 42), as follows:

1. The deadline for completion of all fact discovery shall be extended until **January 31, 2020**.

2. All potentially dispositive motions and supporting briefs shall be filed no later than **March 2, 2020**.
3. Plaintiff's expert reports shall be filed no later than **March 2, 2020**. Defendants' reports shall be filed no later than **April 2, 2020**. Supplemental reports shall be filed no later than **April 16, 2020**.
4. The scheduling of the submissions of motions in limine, the final pretrial conference, pretrial memoranda, proposed voir dire questions, jury selection, proposed jury instructions and trial in this matter will be done in accordance with the Court's standing trial schedule, but with an anticipated trial list of on or about July of 2020.
5. All other provisions of the December 28, 2018 Order shall remain in full force and effect.

Law Offices of Wayne A. Ely

McNees Wallace & Nurick LLC

By: /s/ Wayne Ely
Wayne A. Ely, Esq.
I. D. No. 69670
59 Andrea Drive
Richboro, PA 18954
wayne3236@gmail.com
(215) 801-7979 (phone)

Attorney for Plaintiff

By: /s/ Adam Santucci
Adam L. Santucci, Esq.
I.D. No. 307058
100 Pine Street
P.O. Box 116
Harrisburg, PA 17110-116
(717) 237-5388 (phone)
(717) 160-1655 (fax)
asantucci@mcneeslaw.com

*Attorneys for Defendant
Senate of Pennsylvania*

Office of Attorney General

Myers Brier & Kelly LLP

By: /s/ Allison Deibert
Allison Deibert, Esq.
Deputy Attorney General
I. D. No. 309224
Strawberry Square, 15th Floor
Harrisburg, PA 17120
(717) 705-2532
adeibert@attorneygeneral.gov

*Attorney for Defendant
Commonwealth of Pennsylvania*

By: /s/ Daniel Brier
Daniel T. Brier, Esq.
I.D. No. 53248
425 Spruce Street, Suite 200
Scranton, PA 18503
(570) 342-6147 (phone)
(570) 342-6100 (fax)
dbrier@mbklaw.com

*Attorneys for Defendant
Justin Ferrante*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date, a true and correct copy of the foregoing document was served through the ECF filing system of this Court, upon the following:

Wayne A. Ely, Esquire
Law Offices of Wayne A. Ely
59 Andrea Drive
Richboro, PA 18954

Allison L. Deibert, Esquire
Caleb Enerson, Esquire
Karen M. Romano, Esquire
Office of Attorney General
Strawberry Square, 15th Floor
Harrisburg, PA 17120

Daniel T. Brier, Esquire
Donna A. Walsh, Esquire
Myers, Brier & Kelly, LLP
425 Spruce Street, Suite 200
Scranton, PA 18503

Date: September 30, 2019

/s/ Adam Santucci
Adam L. Santucci